

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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ABILITY OPTO-ELECTRONICS TECHNOLOGY CO., LTD.,  
Petitioner,

v.

LARGAN PRECISION CO., LTD.,  
Patent Owner.

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Case IPR2020-01339  
Patent No. 8,988,796

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**PATENT OWNER'S PRELIMINARY RESPONSE**

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## LIST OF EXHIBITS

Exhibit	Description
2001	<i>Largan Precision Co., Ltd. v. Ability Opto-Electronics Technology Co. Ltd.</i> , E.D. Tex. Case No. 4:19-CV-00696-ALM (Defendants' Invalidity Contentions for U.S. Patent No. 8,988,796) (May 18, 2020)
2002	<i>Largan Precision Co., Ltd. v. Ability Opto-Electronics Technology Co. Ltd.</i> , E.D. Tex. Case No. 4:19-CV-00696-ALM, Docket Item 1 (Complaint for Patent Infringement) (Sept. 25, 2019)
2003	<i>Largan Precision Co., Ltd. v. Ability Opto-Electronics Technology Co. Ltd.</i> , E.D. Tex. Case No. 4:19-CV-00696-ALM, Docket Item 80 (Amended Scheduling Order) (Mar. 27, 2020)
2004	Draft Joint Case Management Statement, <i>Largan Precision Co., Ltd. v. Ability Opto-Electronics Technology Co. Ltd.</i> , N.D. Cal. Case No. 3:20-CV-006607-JD (Oct. 30, 2020)
2005	<i>Open Text S.A. v. Alfresco Software, Ltd</i> , N.D. Cal. Case No. 3:13-CV-04910-JD, Docket Item 213 (Transcript of Proceedings) (June 20, 2014)
2006	<i>Open Text S.A. v. Alfresco Software, Ltd</i> , N.D. Cal. Case No. 3:13-CV-04910-JD, Docket Item 240 (Scheduling Order) (Aug. 25, 2014)
2007	<i>Open Text S.A. v. Alfresco Software, Ltd</i> , N.D. Cal. Case No. 3:13-CV-04910-JD, Docket Listing
2008	United States District Court Northern District of California, General Order No. 72-6 (Sept. 16, 2020)
2009	<i>Largan Precision Co., Ltd. v. Ability Opto-Electronics Technology Co. Ltd.</i> , E.D. Tex. Case No. 4:19-CV-00696-ALM (Expert Declaration of Dr. Rongguang Liang Regarding Claim Construction) (July 13, 2020)
2010	<i>Largan Precision Co., Ltd. v. Ability Opto-Electronics Technology Co. Ltd.</i> , E.D. Tex. Case No. 4:19-CV-00696-ALM (Declaration of Jose Sasian, Ph.D., Regarding Claim Construction of United States Patent Nos. 7,274,518, 8,395,691, 8,988,796, and 9,146,378) (July 13, 2020)
2011	<i>Largan Precision Co., Ltd. v. Ability Opto-Electronics Technology Co. Ltd.</i> , N.D. Cal. Case No. 3:20-CV-006607-JD, Docket Listing

Exhibit	Description
2012	<i>Largan Precision Co., Ltd. v. Ability Opto-Electronics Technology Co. Ltd.</i> , E.D. Tex. Case No. 4:19-CV-00696-ALM (Defendants’ Invalidity Contentions for U.S. Patent No. 8,988,796, Exhibit C4 Invalidity Claim Chart for U.S. Patent No. 8,988,796 (“’796 patent”) Based on U.S. Patent No. 9,097,860 to Hung-Kuo Yu and Chao-Hsiang Yang (“Yu ’860”)) (May 18, 2020)
2013	<i>Largan Precision Co., Ltd. v. Ability Opto-Electronics Technology Co. Ltd.</i> , E.D. Tex. Case No. 4:19-CV-00696-ALM (Defendants’ Invalidity Contentions for U.S. Patent No. 8,988,796, Exhibit C3 Invalidity Claim Chart for U.S. Patent No. 8,988,796 (“’796 patent”) Based on U.S. Patent Application No. 2004/0012861 (“Yamaguchi ’861”)) (May 18, 2020)
2014	<i>Largan Precision Co., Ltd. v. Ability Opto-Electronics Technology Co. Ltd.</i> , E.D. Tex. Case No. 4:19-CV-00696-ALM (Plaintiff Largan Precision Co., Ltd.’s Patent Rule 3-1 and 3-2 Disclosures) (Apr. 2, 2020)
2015	L. Phillips Email to B. Story Regarding Asserted Claims (May 18, 2020)
2016	C. Lee Email to Ability Opto-Electronics Technology Co. Ltd. Regarding Infringement of the ’796 Patent (Aug. 8, 2019)
2017	<i>Largan Precision Co., Ltd. v. Ability Opto-Electronics Technology Co. Ltd.</i> , E.D. Tex. Case No. 4:19-CV-00696-ALM, Docket Item 138 (Defendants’ Responsive Claim Construction Brief) (Sept. 1, 2020)
2018	<i>Largan Precision Co., Ltd. v. Ability Opto-Electronics Technology Co. Ltd.</i> , E.D. Tex. Case No. 4:19-CV-00696-ALM, Docket Item 131 (Largan’s Opening Claim Construction Brief) (July 30, 2020)
2019	[RESERVED]
2020	Certified Translation of Taiwanese Application No. 102139029
2021	Redline showing a comparison of ’796 Patent to Taiwanese Application No. 102139029
2022	’796 Patent’s Claims 1, 15, and 21 to Taiwanese Application No. 102139029 Comparison
2023	U.S. Patent No. 10,502,929 (Lai)

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